

March 20, 2003

Country of Origin Labeling Program  
Agricultural Marketing Service, USDA  
Stop 0249, Room 2092-S  
1400 Independence Ave, SW  
Washington, DC 20250-0249

Subject: Comments on Mandatory COOL

From: Ron Fuqua  
President  
Louisiana Charolais Breeder's Association

Considering that Louisiana hosts the major port city of New Orleans we fully support the implementation of COOL. We ask that when written that the rules meet their original intention of protecting U.S. cattle producers. There is apparently much pressure from packers, wholesalers, retailers, importers, exporters, and other beef industry groups to complicate the rules. Many believe that this is a coordinated effort to derail or dilute COOL to the point of no effect. The USDA must consider this important fact when writing the mandatory regulations. COOL was not set up for the benefit of these groups and this certainly must be considered when the final rules are rolled out. U.S. cattle producers are concerned about meat safety, quality, and of course the ability to compete in their enterprise. In addition we express these points:

1. The requirement of auditable records to U.S. producers should not be implemented. This task should lay on the exporting countries and/or importers. Simply, if an animal is not tagged it should be considered of U.S. origin and eligible for the USA label. This would remove unnecessary costs and burdens on U.S. producers that do not handle imported cattle. The burden of proof should not rest on our U.S. cattle producers.
2. The issue of an animal ID system must not be tied back to COOL. COOL and animal ID are two separate issues. It should be clearly stated that the law prohibits a mandatory animal ID system.
3. Third party verification of U.S. cattle's origin is not required. Some packers are insisting that this happen and that it is required. It must be kept in mind that this was not a part of the legislation and should be stated so in the final rule. A caveat indicating that verification is not required would fit well in the mandatory ruling along with language that would prohibit "unjust discriminatory practice" by a packer, for example, requiring a verification audit of a U.S. producers cattle.
4. That the small farmer and rancher in the U.S. is slowly disappearing. A critical part of our U.S. culture is gradually being eliminated. One factor in this is the flood of cheap food imports making us more dependent on foreign countries and a loss of self-sufficiency. In addition, surveys have indicated that U.S. consumers trust U.S. beef and do not trust beef from other countries. These factors must be considered in the creation of the final ruling.

Sincerely,



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